

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>HYPERQUEST, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 08 C 485</b>
	)	
<b>v.</b>	)	<b>Judge Charles R. Norgle</b>
	)	<b>Magistrate Judge Cole</b>
<b>NUGEN I.T., INC., and DAYLE</b>	)	
<b>PHILLIPS</b>	)	<b>JURY DEMAND</b>
	)	
<b>Defendants.</b>	)	

**MOTION FOR ONE-WEEK EXTENSION OF TIME**

HyperQuest, Inc. f/k/a HQ, Inc. ("HQ") respectfully requests that this Court grant HQ a one-week extension of time to file its responsive brief to Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction ("Motion to Dismiss"). In support of this request, HQ states as follows:

1. On May 14, 2008, NuGen I.T., Inc. ("NuGen") and Dayle Phillips ("Phillips") (collectively "Defendants") filed their Motion to Dismiss this case.
2. On May 15, 2008, this Court set a briefing schedule requiring that HQ file its response by May 23 and that Defendants file their reply by May 30.
3. The briefing schedule set by this Court provides HQ with approximately one week to file its response to Defendants' potentially dispositive motion. Although Defendants correctly note that the issue upon which Defendants seek relief has been briefed in a proceeding in front of Judge Shadur, *HyperQuest, Inc. v. N'Site Solutions, Inc. & Unitrin Direct Auto Insurance*, Case Number 08-cv-483 (N.D. Ill.), the issues in this case are not identical to those in the other matter.

4. HQ believes that Judge Shadur's ruling in Case No. 08-cv-483 was incorrect, and would like sufficient time to explain to the Court the reasons for that belief.

5. HQ's counsel has significant scheduling conflicts, including multiple days of out-of-town travel, that will prevent them from having adequate time to prepare a response in this matter. Accordingly, HQ respectfully requests a one-week extension of time to file its response brief.

6. HQ asked Defendants to consent to the extension, but Defendants declined to do so.

7. The parties have fully briefed Defendants' motion to dismiss for lack of personal jurisdiction, and this Court has indicated that it hopes to rule on that motion by July 18, 2008. With this one-week extension, this motion would still be fully briefed well in advance of that time. Accordingly, this request will not cause any undue delay of these proceedings. This motion is made in the interest of justice and not for purposes of delay, and will not prejudice any party.

WHEREFORE, HyperQuest, Inc. respectfully requests that this Court grant HyperQuest, Inc. until Friday, May 30, 2008 to respond to Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction.

Respectfully submitted,

**HYPERQUEST, INC.**

By: /s/ Chad A. Blumenfield  
One of Its Attorneys

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